

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

IN RE: AETNA UCR LITIGATION,

This Document Relates To: ALL CASES

***FILED ELECTRONICALLY***

MDL NO. 2020

MASTER FILE NO. 2:07-CV-3541  
(FSH)

**DECLARATION OF PATRICIA A. LEE**

I, Patricia A. Lee, hereby certify and state:

1. I am an attorney at Connell Foley LLP, counsel for Defendants Aetna Health Inc. PA, Corp., Aetna Health Management, LLC, Aetna Life Insurance Company, Aetna Health and Life Insurance Company, Aetna Health Inc., and Aetna Insurance Company of Connecticut (collectively, "Aetna").

2. I make this declaration in support of Defendants' Motion to Dismiss Plaintiffs' Joint Consolidated Amended Complaint and Plaintiffs' Second Joint Consolidated Amended Complaint.

3. Attached hereto as **Exhibit A** is a chart summarizing the grounds for dismissal with respect to claims against Aetna, organized by Plaintiff and by Count in the Complaint.

4. Attached hereto as **Exhibit B** is a chart summarizing the grounds for dismissal with respect to claims against UnitedHealth Group, Inc., and Ingenix, Inc., organized by Plaintiff and by Count in the Complaint.

5. Attached hereto as **Exhibit C** is a true and correct copy of the Summary Plan Description for the health benefits plan for Citigroup effective January 1, 2008, applicable to Plaintiff Angela Hull. A copy of this document was previously filed as Exhibit J to the Declaration of Karen Stiles dated September 9, 2009, Docket Entry No. 250 ("Stiles Declaration").

6. Attached hereto as **Exhibit D** is a true and correct copy of the Group Agreement and Member Certificate of Coverage for ACSA / La Casa De Don Pedro Inc. effective July 1, 2003 through June 30, 2004, applicable to Plaintiff Darlery Franco. A copy of this document was previously filed as Exhibit E to the Stiles Declaration.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: October 26, 2010

  
Patricia A. Lee